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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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April 28, 1993

Office Of The Secretary
Federal Communication Commission
Washington, D.C. 20554

Comments on Docket 92-235, Frequency Farming -

Mr Secretary:

I congratulate all the work that must have been put into trying to improve the Part 90 and provide more use of the frequency spectrum. However, with all the time and labor that went into the writing of DOC 92-235, I feel there was very little concern for the major 2-way communication equipment users throughout the nation. Surely, concern for the impact of this proposal and its short time span, to be in place, was not given any realistic consideration.

The City of Houston Fire Department has just turned up our simulcast transmitting system that cost three million (3 million) plus dollars to install. The mobile and portable radios in this system will not operate on 12.5 KHz bandwidth.

The Simulcast system was engineered for City wide Metropolitan coverage. Now, with the reduction in power levels as suggested in section 88.429 re-engineering would be a required and the addition of new transmitter sites. In other words, within a three (3) year period, we are asked to throw away all this equipment, for a new system, without any equipment amortization period.

At present, to meet the FCC proposed target date for 12.5 kHz bandwidth, it would cost the City of Houston, Fire Department, approximately \$4,467,088.00 to completely change out all communication radios, and add additional transmitter sites, to permit a communication system that would operate on 12.5 kHz bandwidth. This does not take into account the cost for new test equipment to maintain the equipment.

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In addition to the cost for changing our 2-way communication system there will be another approximately 1.5 million dollars to replace our 952.200 Mhz fire alerting microwave system. FCC made this mandatory, in FCC Rules Part 94.65(1), to change from our original authorized 200 Khz bandwidth, which we are fully utilizing, to a 12.5 Khz bandwidth by June 30, 1996. Since there is no way that our present alerting system can operate within a 12.5 kHz bandwidth, some method to continue this operation must be found. Possibly a less secure method of leased fiber optic and copper.

Cost of the simulcast system just installed and cost to replace this equipment to get to the 12.5 kHz, by January 1996, and then within a five (5) year period to change it out again to a system that would provide for the 6.25 kHz is beyond the finance capabilities of the City of Houston.

We must, also, take into consideration that this dollar amount does not include the City Police Department. Combining these two departments together would make this is an unrealistic dollar amount for the City to fund, in the short time span proposed by FCC.

Vendors that we normally work with, when purchasing 2-way radios, have said that they would not be capable of meeting the demand for 12.5 kHz bandwidth radio units that would have to be produced for a national changeover, in the allotted time. There is no known technology that would permit the production of equipment that will permit 6.25 kHz in 2-way FM communication equipment and satisfy operating systems that are now in place within Public Safety.

Two (2) years work has gone into the APCO Project 25. Vendors and users working together for a workable narrow bandwidth system. Together they made the project come about, agreeing to move slowly to a narrow bandwidth as technology permits. 12.5 kHz bandwidth is just now coming into reality, due to the APCO Project 25. FCC was knowledgeable of this effort and I feel

FCC must reconsider the unrealistic dates for spectrum farming and work with the user agencies and vendors to meet their goal of 6.26 kHz band width.

I propose that FCC look at 12.5 kHz to be mandatory by year 2001 and the 6.25 kHz be held to manufacturer engineer studies until it has been perfected for communication systems of today and in